

MEMO TO THE ADMINISTRATIVE RECORD ASHLAND DRUM SITE

FROM: PAM BRUNO, ADMINISTRATIVE RECORD COORDINATOR

THE DRUM REMOVAL AT ASHLAND WAS AN EMERGENCY ACTION AND THE SITE ASSESSMENT WAS DONE IN CONJUNCTION WITH THE WORK PLAN AND NOT PREPARED AS A STAND ALONE DOCUMENT. TO PROVIDE BACKGROUND INFORMATION THE SITE DESCRIPTION AND SITE BACKGROUND SECTIONS FROM THE WORK PLAN ARE ATTACHED.

1.0 INTRODUCTION

This work plan has been developed to outline the work to be performed by the United States Environmental Protection Agency's (US EPA) Response and Prevention Section (R&PS) and their contractors. All work will be consistent with remedial goals at the site and in accordance with Section 300.65 of the National Contingency Plan (NCP) for a removal action as contained in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, as amended by the Superfund Amendments and Reauthorization Act (SARA) of 1986.

This work plan is subject to change as site conditions necessitate, or if more efficient, cost-effective methods are developed. Any deviations from this work plan will be approved by the EPA On-Scene Coordinator (OSC) prior to implementation and documented.

1.1 Site Description

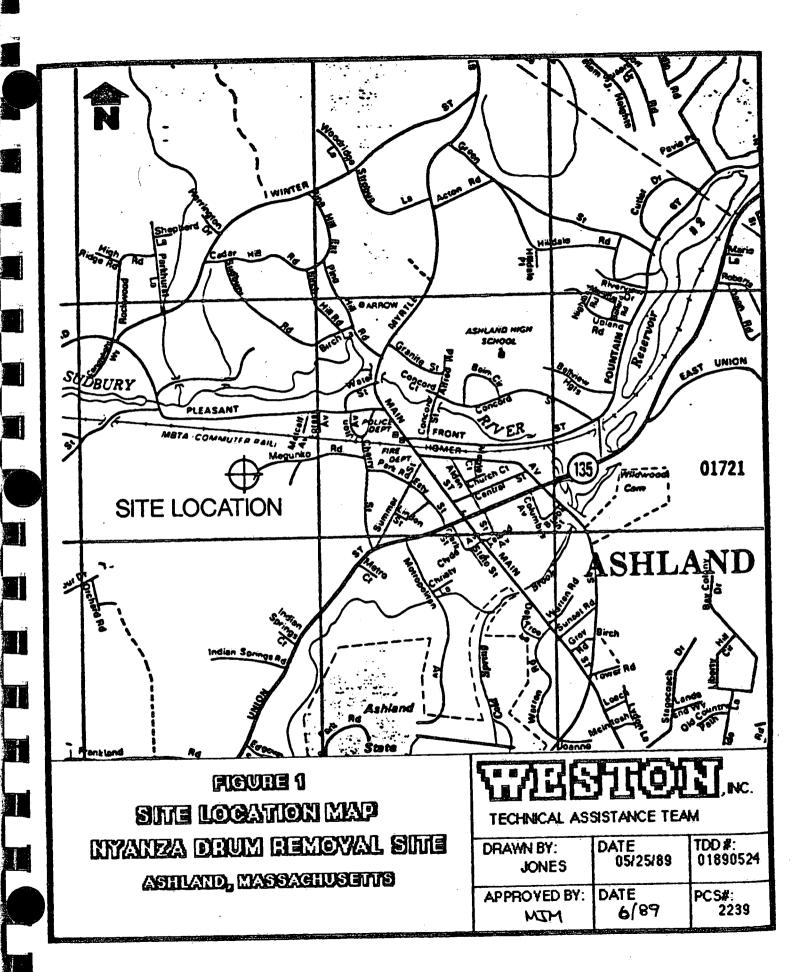
The Ashland Drum Removal Site is located on Megunko Road in Ashland, Middlesex County, Massachusetts, within the work area of the Nyanza Remedial Construction Site. The remedial site is approximately 25 acres in size and the drum removal area is resticted to a 0.5 acre parcel. The site is bordered on the east by the Nyacol Corporation Manufacturing Facility, on the south and west by Megunko Hill and on the north by Chemical Brook and the old Boston and Maine Railroad. The Sudbury River is located 750 feet to the north of the site. The land use surrounding the site is industrial with several fuel and chemical storage facilities (Figure 1).

TN-2 Site Background

From approximately 1910-1979, the area of the present Nyanza Hazardous Waste Site was occupied by a number of textile dye manufacturing companies. The last dye manufacturing company to occupy the site was Nyanza Co., which closed in 1978. The remedial site was used as a sludge disposal area and the clean up project was well underway when the drum disposal area of concern was discovered.

The United States Environmental Protection Agency's (USEPA) Superfund Waste Management Division requested the USEPA Emergency Planning and Response Branch to conduct a buried drum investigation at the site. The Roy F. Weston, Inc. Technical Assistance Team (TAT) was tasked to assist with the investigation, which was conducted from May 16 to May 18, 1989. The buried drum investigation involved the excavation of several test pits, sampling of the liquid contents of any drums uncovered, on-site analysis of the samples with a portable gas chromatagraph, and securing the drum area with polyethylene sheets.

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The test pit excavations showed that the drum area was confined to an area approximately 50 feet by 100 feet, along the slope of an on-site access road (Figure 2). The excavations in the drum area uncovered approximately 15 drums, in various stages of deterioration, of which 4 contained liquids and could be sampled. The on-site analysis indicated that the drums contained liquids which had volatile organic compound constituents. An environmental sample was also collected from a downgradient wetland and on-site analysis indicated that no volatile organic compounds were present. The drum area excavation was covered with polyethylene sheets following the investigation to reduce any vapors which may be released and to prevent rainwater from entering the area.

2.0 STATEMENT OF WORK

Removal activities for the Ashland Drum Removal Site will consist of 1) mobilization and demobilization at the site by the Removal Contractor, 2) excavation of the buried drums, 3) the removal, overpacking, staging, sampling, and disposal of any drums containing liquid hazardous waste, and, 4) the separation of any contaminated soil and empty or solid containing drums to be stockpiled for disposal on site by the Remedial Project contractor.

It is estimated that approximately five (5) days will be required to complete the project. The length of the project will vary depending on the number of drums encountered. During the course of the on-site activities, personnel from TAT will provide all air monitoring and any technical input to the US EPA On-Scene Coordinator (OSC) concerning the removal action.

3.0 PERSONNEL

The following organizations are expected to be involved in the Ashland Drum Removal Action.

U.S. Environmental Protection Agency Response & Prevention Section Thomas Condon, OSC

U.S. Environmental Protection Agency Superfund Waste Management Division David Lederer, Remedial Project Manager, RPM

Roy F. Weston Technical Assistance Team Burlington, MA Timothy Jones

Massachusetts Department of Environmental Engineering (DEQE) Northeast Region Patricia Donahue